

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALFOUSSEINY KELLY,
Plaintiff,

v.

MARCHE MOVENPICK, RICHTREE
U.S.A., IGOR REICHERT, HOLGER
MAMMEN, LIZA KASTROM,
MARTINE THOMAS, ELIE
GHORAYEB,
Defendants.

Civil Action No. 04-12028-RGS

DEFENDANT'S LOCAL RULE 16.1 CERTIFICATION

Defendant, Richtree, USA, Inc., d/b/a Marche Movenpick¹, and the undersigned counsel for Defendant, in accordance with Rule 16.1(D)(3) of the Local Rules of the United States District Court for the District of Massachusetts, hereby certify that they have conferred:

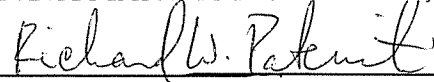
a) with a view to establishing a budget for the cost of conducting the full course -- and various alternative courses -- of this litigation; and

b) to consider the resolution of this case through the use of alternative dispute resolution programs, such as those outlined in Local Rule 16.4.



RICHTREE U.S. INC.

D/B/A MARCHE MOVENPICK,



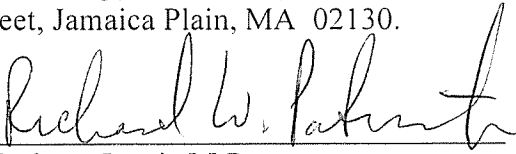
Andrew C. Pickett, BBO #549872
Richard W. Paterniti, BBO#645170
Jackson Lewis LLP
75 Park Plaza
Boston, MA 02116
(617) 367-0025

January 21, 2005

¹ Plaintiff has incorrectly identified these entities in his Complaint as Marche Movenpick and Richtree U.S.A.

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2005, a copy of the foregoing was delivered by first class mail to Robert M. Warren, 11 Green Street, Jamaica Plain, MA 02130.


Jackson Lewis LLP